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April 2, 2019

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

Re: Great Western Insurance Company v. Mark Graham, et al., Case No. 18-06249 (VSB)

Dear Judge Broderick:

We are counsel for defendants, Donald Solow, Regatta Holdings LLC, Cygnet 001 Master Trust, Cygnet 001 Master Trust Series 2011-A, Cygnet 001 Master Trust Series 2011-C, and Cygnet 001 Master Trust Series 2013-A (together, the “SRC Defendants”) in the above-referenced action.

Per Rule 4.J of Your Honor’s Individual Rules & Practices in Civil Cases (“Individual Rules”), the SRC Defendants ***hereby respectfully request oral argument*** in connection with their Motion to Dismiss Counts Two through Eight and Eleven of of plaintiff, Great Western Insurance Company’s Second Amended Complaint dated December 19, 2018 (Dkt. No. 106.)

Further, all motion papers pertinent to the SRC Defendants’ Motion to Dismiss (Dkt. Nos. 130-32, 145 and the SRC Defendants’ reply memorandum of law filed today) will be hand-delivered to the Court in two printed courtesy copies, prepared in accord with the requirements of Rule 4.E. of Your Honor’s Individual Rules.

Respectfully submitted,


Michael S. Gordon

cc: All Counsel of Record